

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Application of BellSouth Corporation,)	CC Docket No. 97-231
BellSouth Telecommunications, Inc.)	
and BellSouth Long Distance, Inc.)	
for Provision of In-Region, InterLATA)	
Services in Louisiana)	

**Exhibit P:
Excerpt from Louisiana PSC Transcript
(Oct. 22, 1997)**

**COMPLETE TRANSCRIPT OF OCTOBER 22, 1997 OPEN SESSION OF
THE LOUISIANA PUBLIC SERVICE COMMISSION HELD IN BATON
ROUGE, LOUISIANA. PRESENT WERE CHAIRMAN DON OWEN,
VICE CHAIRMAN IRMA MUSE DIXON AND COMMISSIONERS DALE
SITTIG, JIMMY FIELD AND JAY BLOSSMAN.**

EXHIBIT NUMBER

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1 this year is a budget -- a fiscal session.

2 **SECRETARY ST. BLANC:** That's correct.

3 **VICE CHAIRMAN DIXON:** We are looking at, I don't know, I guess since
4 we're moving from normal regulatory regulation or rate of return regulation to
5 competition, we were looking at trying to do things to be creative. And if we
6 needed to increase staff to be able to handle a lot of these things, we were. So, I
7 want to thank y'all for taking the time out and we look forward to you coming out
8 and meeting with us so we can get the budget in.

9 **SECRETARY ST. BLANC:** Well, we want to thank the staff members of the
10 district offices. I know it's kind of hard for you guys to put that stuff together.

11 **COMMISSIONER SITTIG:** It was on J.W. I know I heard a lot about it.

12 **SECRETARY ST. BLANC:** Next time, could you send somebody else,
13 Commissioner.

14 **VICE CHAIRMAN DIXON:** J. W., you're doing a fine job. Thank you so
15 much.

16 **CHAIRMAN OWEN:** We through? Okay. Commissioner Field wants to call up
17 an item that is not on the agenda. Would you like to make a motion to that effect?

18 **COMMISSIONER FIELD:** Yes. Commissioner Owen, other Commission
19 members, this is not my original work. Really, it's very similar to what they did in
20 the State of Georgia.

21 **CHAIRMAN OWEN:** I think you need to make a motion to bring up an item not
22 on the agenda. We got a second on --

23 **SECRETARY ST. BLANC:** Commissioner, are you just going to order us to

1 start a case.

2 **COMMISSIONER FIELD:** Yes.

3 **SECRETARY ST. BLANC:** We really don't -- if he's just telling us to begin -- I
4 don't think we need to bring it up.

5 **MR. EDDINGTON:** Right. That doesn't require a formal vote; therefore, there's
6 no need to --

7 **COMMISSIONER FIELD:** We just want to set up a docket.

8 **MR. EDDINGTON:** -- suspend the rules.

9 **SECRETARY ST. BLANC:** No, you can just go ahead and --

10 **MR. EDDINGTON:** Basically, you just need to tell us.

11 **COMMISSIONER SITTIG:** The fact that it's not on the agenda, doesn't he
12 need a motion to bring it up.

13 **MR. EDDINGTON:** No.

14 **SECRETARY ST. BLANC:** Not if he's just telling us to start a docket.

15 **MR. EDDINGTON:** Not to discuss it if it does not require a formal Commission
16 vote.

17 **VICE CHAIRMAN DIXON:** Excuse me. Back when I asked for an area called
18 other items or related areas or items, remember, related items so people can bring
19 up things like this. We need that area on the agenda. It's not a motion area. It's
20 just that if you want to discuss something.

21 **SECRETARY ST. BLANC:** Non-voting items.

22 **VICE CHAIRMAN DIXON:** Right. That's it. Thank you.

23 **COMMISSIONER FIELD:** I'd like to request the Commission staff with the

1 support of the other Commissioners, to open up a docket to consider the adoption
2 of a comprehensive set of performance measurements which shall govern the
3 provision of interconnection, unbundling and resale between incumbent local
4 exchange carriers and competing local exchange carriers. The purpose of the
5 standards adopted shall ensure that the mandates contained within the federal
6 Telecommunications Act of 1996 and the LPSC local competition regulations to
7 open local exchange markets to competition are implemented and that quality
8 service is provided to the consumers and end users of all carriers. The staff is
9 directed to notify BellSouth and all carriers with which it has interconnection
10 agreements and/or is negotiating with and/or which have intervened in any
11 telecommunications docket pending before this Commission as a result of the 1996
12 Telecommunications Act and the LPSC local competition regulations. After
13 notification, staff shall establish a procedural schedule and parameters of pre-filed
14 testimony to be submitted by BellSouth and all interested parties which pre-filed
15 testimony shall address at a minimum the following issues and I'll just read maybe
16 two of them to give you an idea, I have eight here, to what extent and under what
17 circumstances, if any, should the Commission require an incumbent LEC to
18 perform activities in its wholesale operations and time frames and at what quality
19 levels comparable to those that it performs for itself. (2) To what extent, if any,
20 should the Commission consider the adoption of specific intervals for installation
21 and resale of unbundled loops and telephone number portability. If you'd like, I
22 could read the rest of them, but that's basically what it is.

23 **VICE CHAIRMAN DIXON:** I'd like a copy.

1 **COMMISSIONER BLOSSMAN:** Yes, I'd like to look at it.

2 **CHAIRMAN OWEN:** Could I ask a question?

3 **COMMISSIONER FIELD:** Certainly.

4 **CHAIRMAN OWEN:** You probably have researched this and know, but, Paul,

5 are these items adequately covered in our rules?

6 **MR. GUARISCO:** Well, I think what Commissioner Field is proposing are

7 specific measurements and specific standards by which a carrier should meet things

8 in certain time frames. Is that -- I think I understand it correctly.

9 **COMMISSIONER FIELD:** That's correct.

10 **MR. GUARISCO:** So, we do not have specific measurements and specific time

11 frames. We just have obligations and duties to comply with the unbundling and

12 interconnection requirements. This seems to be a more detailed rulemaking and a

13 more detailed -- it should result in more detailed rules and regulations than we

14 currently have in place today.

15 **COMMISSIONER FIELD:** This is just to determine if we need to do that,

16 Commissioner Owen.

17 **CHAIRMAN OWEN:** Fine. I don't think anybody has any trouble with that.

18 **SECRETARY ST. BLANC:** We'll take note and start it up.

19 **CHAIRMAN OWEN:** Go ahead. Let go on ahead and do Number 38. We'll get

20 Karen up here and --

21 **MR. EDDINGTON:** Mr. Fonham is still torturing poor innocent law students.

22 **CHAIRMAN OWEN:** I'm sorry.

23 **MR. EDDINGTON:** I said, Mr. Fonham is still torturing poor innocent law

**Before the
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In the Matter of)	
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Application of BellSouth Corporation,)	CC Docket No. 97-231
BellSouth Telecommunications, Inc.)	
and BellSouth Long Distance, Inc.)	
for Provision of In-Region, InterLATA)	
Services in Louisiana)	

**Exhibit Q:
Reply Affidavit of William M. Stacy (BellSouth)
in CC Docket No. 97-208**

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Application by BellSouth Corporation,
BellSouth Telecommunications, Inc.
and BellSouth Long Distance, Inc., for
Provision of In-Region, InterLata
Services in South Carolina

CC Docket No. 97-208

REPLY AFFIDAVIT OF WILLIAM N. STACY

William N. Stacy, being duly sworn, deposes and says:

I. PURPOSE OF THE AFFIDAVIT

1. The purpose of my affidavit is to both clarify and refute various statements and conclusions in the Department of Justice's (DOJ) recommendation to the Federal Communications Commission (FCC) concerning performance measurements set out in BellSouth's 271 application in South Carolina. In particular, I will address Mr. Michael J. Friduss' affidavit. Mr. Friduss indicated there were several measurements that he had not found in BellSouth's permanent performance measures, SGAT, or in any interconnection agreement he had reviewed. He also listed, on page 31 of his affidavit, the performance measures that BellSouth should provide in order to demonstrate parity and/or non-discrimination.

2. I will address Mr. Friduss' comments by first addressing performance measurements that were included in the South Carolina filing, yet overlooked by Mr. Friduss in his review. Primarily, these measurements are related to Operational Support Systems (OSS). Next, I will address those measurements that BellSouth will adopt going forward based on the DOJ's input. Next, I will address those performance

measures which BellSouth believes are not necessary or required to demonstrate parity and/or non-discrimination. Finally, I will address the "adequacy" measures defined by Mr. Friduss.

II. Performance Measurements Included in September 30, 1997 South Carolina Filing

3. Mr. Friduss stated, on page 15 (paragraph 54) of his affidavit, that BellSouth did not include "any pre-ordering performance measures in its permanent measurements, SGAT, or in interconnection agreements" that he reviewed. These measurements were included in my OSS Affidavit (Appendix A, Exhibit 12). Pre-ordering OSS scheduled and actual availability performance data was provided in Exhibit WNS-35 and Exhibit WNS-36. Response time intervals for pre-ordering functions were shown in Exhibit WNS-37. Response time intervals were not provided for customer service record retrieval and product/service availability retrieval because the access mechanisms, utilized by CLECs and BST retail, measure response times using different criteria. BellSouth has incorporated OSS availability and response time interval performance measurements as part of its permanent set of measurements.

4. Additionally, Mr. Friduss indicated that for the overall maintenance measures, BellSouth had provided all of the required measures except for OSS availability. Again, that particular measurement was in the OSS Affidavit, Exhibit WNS-35.

5. Mr. Friduss also noted on page 17 (paragraph 57) of his affidavit that BellSouth had not provided any measurements for service order quality. Mr. Friduss listed four different measures which he believed addressed service order quality: service order accuracy, percent reject orders, order submissions per order, and percent flow through. Mr. Friduss further stated that all of these measurements were not necessary to determine the reliability of the service order submission process, and that one or more would be sufficient. In my initial OSS Affidavit, data was provided on two of these measures: percent flow through and percent rejects (Exhibit WNS-41).

6. On page 17 and 18 of his affidavit, Mr. Friduss indicated speed of answer for the ordering center was an important measure of adequacy in a manual or electronic environment. Local Carrier Service Center (LCSC) performance data was provided in my OSS affidavit (Exhibit WNS-46).

7. On page 31, Mr. Friduss indicated BellSouth should provide percent service provisioned out of interval as an ongoing measurement. BellSouth provided such data in my Performance Affidavit (Exhibit WNS-10).

8. Mr. Friduss stated, on page 26 of his affidavit, that BellSouth had not proposed any billing measures in its permanent measurements; however, he noted that the BellSouth/AT&T agreement contained a bill timeliness, bill accuracy and bill completeness measurement. Again, BellSouth addressed this particular measurement in the OSS Affidavit, Exhibit WNS-53. BellSouth provided performance data on its Optional Daily Usage File (ODUF). BellSouth intended to provide comparative data using its Centralized Message Distribution System (CMDS) performance but inadvertently left out the comparative data during the data collection process. The timeliness measurement is considered a permanent BellSouth measurement. The CMDS performance data is shown in Reply Exhibit WNS-1, attached to this affidavit.

9. On page 28 of his affidavit, Mr. Friduss stated BellSouth did not propose any measurements for facilities-based CLECs. The unbundled loop report, in my Performance Affidavit (Exhibit WNS-3), applies to facilities based CLECs.

III. Additional Measurements Adopted as Part of BellSouth's Permanent Measurements

10. Mr. Friduss noted that BellSouth provided average provisioning interval performance data; however, he expressed concern that BellSouth's data addressed issue date to original due date, not issue date to completion date. BellSouth continues to state that this particular measure is not a valid indicator of parity for assessing wholesale performance results which impact end-users. However, BellSouth has made this information available as part of its response. Exhibit WNS-2 provides October performance data for BellSouth retail and the CLECs. Overall results reflect non-discriminatory performance.

11. BellSouth will also include, in its permanent measures, Maintenance Missed Appointment performance data for unbundled network elements on a going forward basis.

IV. Measurements Not Required or Necessary to Demonstrate Parity or Non-Discrimination

12. On page 17 of his affidavit, Mr. Friduss recognized that BellSouth has agreed to provide Firm Order Commitment (FOC) and Rejected Order performance data as part of its contractual measurements. BellSouth did not include an FOC or Reject permanent measure because providing the data on an aggregate basis would be meaningless given the various performance targets requested by the CLECs. Mr. Friduss appears to define the performance standard in his Affidavit rather than allow BellSouth and the CLECs to negotiate specific timeliness measurements for return of order completion information based on their specific business needs. For FOCs and rejects, BellSouth has agreed to provide performance data on a CLEC specific basis based on contractual requirements.

13. BellSouth does not agree with Mr. Friduss' assertions regarding market and product parity requirements. For market parity, he suggests two main categories for customer groupings (geographic and class of service). While BellSouth does not disagree with the basic premise of this statement, BellSouth disagrees with the

geographic and product granularity that Mr. Friduss further purports in his discussion. BellSouth has provided geographic and class of service performance data. It has provided state and regionwide data for residence and business classes of service. BellSouth has also agreed to provide performance data on special services (designed services) as evidenced by its agreement with AT&T. BellSouth does not agree, however, with Mr. Friduss' suggestion that BellSouth must provide performance measures "where a CLEC markets its products" and for "any specific product a CLEC chooses to provide end users in South Carolina."

14. To require BellSouth to produce data for a product in a specific wire center is totally unreasonable. BellSouth could literally spend hundreds of thousands of man-hours and dollars to produce an undetermined number of performance reports. The Act imposes no such requirement.

15. BellSouth has already committed to, and provided, dozens of measurements on its OSS functions, provisioning and maintenance functions, billing functions, etc.. These measures are sufficient to demonstrate parity and non-discrimination. Regardless of whether a CLEC operates in a single wire center or throughout a state, if the end user customer is not satisfied, if appointments are not met and out-of-service conditions occur, BellSouth's permanent measurements will reflect that end user dissatisfaction. As indicated in my performance affidavit on page 9, BellSouth will conduct analyses to correct any discrepancy in CLEC performance. These root cause analyses will identify if there is a particular problem in a geographic location, a facilities held condition, or a particular problem in provisioning a specific product. To require BellSouth to produce performance data at the level suggested by Mr. Friduss is both unreasonable and unnecessary.

16. On page 23 of his affidavit, "an orders held for facilities" measurement was cited as being necessary. BellSouth does not believe this measurement is necessary since the

provisioning appointments met measurement reflects the result of any held orders. Moreover, BellSouth does not have this data currently available in its Data Warehouse.

17. As to the "other" category described by Mr. Friduss on page 26, BellSouth did not include Operator Services Speed of Answer and Directory Assistance Speed of Answer measures in its permanent measurements. BellSouth does not negotiate specific speed of answer targets with individual CLECs. Rather, BellSouth is accountable to each state's Public Service Commission (PSC) for adhering to an average speed of answer measurement for all parties. This measurement is set by the PSCs.

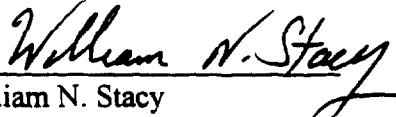
V. Adequacy Measures

18. Mr. Friduss, on page 8 of his affidavit, recognizes that an "apples to apples" comparison is not always possible, especially for those services that BellSouth provides only to its CLEC customers. He applies the term "adequacy measures" in an effort to describe the type of performance data that is required to demonstrate or determine whether CLECs have been afforded a meaningful opportunity to compete. However, on page 19, Mr. Friduss incorrectly assumes that unbundled network element (UNE) processes are analogous to retail processes in several instances. First, and foremost there is an incremental step that is always involved in provisioning a UNE that is not required when handling a retail order. BellSouth cannot close out a UNE order until the technician calls the CLEC to "accept the UNE". UNEs are not analogous to retail as specified by the FCC in its Michigan Order, #141.

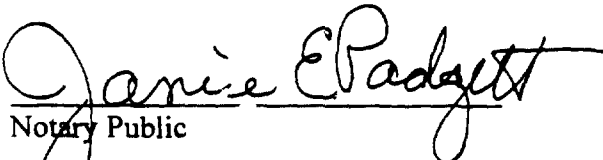
VI. Summary

19. In summary, BellSouth is committed to providing service to its CLEC customers in a non-discriminatory manner. BellSouth is also committed to collecting and providing the necessary data and reports that demonstrate parity or non-discrimination. BellSouth has proposed and adopted a robust set of performance measures which meet this criteria. BellSouth has further demonstrated its commitments by developing a Data Warehouse and offering to provide CLECs with access. BellSouth conforms to required performance measurement obligations.

20. I hereby swear that the foregoing is true and correct to the best of my information and belief.


William N. Stacy
Assistant Vice President
Interconnection Services
BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this 12
day of November, 1997.


Janice E. Padgett
Notary Public
**Notary Public, Gwinnett County, GA
My Commission Expires Feb. 19, 2000**

ISSUE DATE TO COMPLETION DATE AVERAGE INTERVAL REPORT

Time Period: 10/1/97 - 10/31/97

ORDER TYPE	CLASS OF SERVICE	BST		CLEC	
		S.C.	AGGREGATE	S.C.	AGGREGATE
"C"	Residence Non Dispatch	1.6	1.7	1.7	2.2
	Residence Dispatch Out	6.1	6.0	1.0	5.4
	Business Non Dispatch	1.6	1.5	1.9	2.2
	Business Dispatch Out	6.7	6.0	4.0	6.8
"N"	Residence Non Dispatch	2.4	2.8	6.2	5.2
	Residence Dispatch Out	8.0	7.3	8.0	6.5
	Business Non Dispatch	2.2	2.7	3.7	3.6
	Business Dispatch Out	12.6	10.3	3.2	4.9
"T"	Residence Non Dispatch	4.8	4.9	2.3	2.7
	Residence Dispatch Out	9.4	8.7	2.0	5.8
	Business Non Dispatch	5.1	4.9	3.0	5.6
	Business Dispatch Out	12.9	11.2	13.0	9.7

Issue to
Completi
n Date
Intervals
Report
Time
Period:
10/01/199
7 -
10/31/199
7

	Same Day	1	2	3	4	5	>5
SC Residential Non-Dispatched							
LCSC C Orders	28	26	1	2	0	1	
% of Total Orders	48.28	44.83	1.72	3.45	0	1.72	
% of Total Orders - Cumulative	48.28	93.1	94.83	98.28	98.28	100	100
BST C Orders	82174	43584	3373	5209	1243	196	66
% of Total Orders	60.23	31.94	2.47	3.82	0.91	0.14	0.4
% of Total Orders - Cumulative	60.23	92.17	94.64	98.46	99.37	99.51	100
BST Residential Non-Dispatched							
LCSC Subtotals C Orders	6624	4244	905	830	169	74	40
% of Total Orders	49.99	32.03	6.83	6.26	1.28	0.56	3.0
% of Total Orders - Cumulative	49.99	82.02	88.85	95.11	96.39	96.94	100
BST Subtotals C Orders	1551881	834747	67017	101289	23566	5600	2746
% of Total Orders	59.42	31.96	2.57	3.88	0.9	0.21	1.0
% of Total Orders - Cumulative	59.42	91.39	93.95	97.83	98.73	98.95	100
SC Residential Dispatched	Same Day	1	2	3	4	5	>5

LCSC C Orders	1	0	0	0	0	0	0
% of Total Orders	100	0	0	0	0	0	0
% of Total Orders - Cumulative	100	100	100	100	100	100	100

BST C Orders	74	45	299	103	264	151	565
% of Total Orders	4.93	3	19.92	6.86	17.59	10.06	37.64
% of Total Orders - Cumulative	4.93	7.93	27.85	34.71	52.3	62.36	100

BST
Residential
Dispatch

LCSC Subtotals C Orders	7	8	11	7	5	1	11
% of Total Orders	14	16	22	14	10	2	22
% of Total Orders - Cumulative	14	30	52	66	76	78	100

BST Subtotals C Orders	1591	3289	4011	3072	3416	2329	7468
% of Total Orders	6.32	13.06	15.93	12.2	13.57	9.25	29.66
% of Total Orders - Cumulative	6.32	19.38	35.32	47.52	61.09	70.34	100

Same Day	1	2	3	4	5	>
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SC
Business

Non-Dispatched

LCSC C Orders	61	47	7	12	4	1	1
% of Total Orders	45.86	35.34	5.26	9.02	3.01	0.75	0.75
% of Total Orders - Cumulative	45.86	81.2	86.47	95.49	98.5	99.25	100

BST C Orders	11496	4711	107	177	198	43	294
% of Total Orders	67.52	27.67	0.63	1.04	1.16	0.25	1.73
% of Total Orders - Cumulative	67.52	95.19	95.82	96.86	98.02	98.27	100

BST
Business
Non-Dispatched

LCSC Subtotals C Orders	1693	1357	905	108	74	21	61
% of Total Orders	40.11	32.15	21.44	2.56	1.75	0.5	1.44
% of Total Orders - Cumulative	40.11	72.26	93.7	96.26	98.01	98.51	100

BST Subtotals C Orders	240849	80112	7833	5003	4334	1401	4290
% of Total Orders	70.05	23.3	2.28	1.46	1.26	0.41	1.25
% of Total Orders - Cumulative	70.05	93.35	95.63	97.08	98.34	98.75	100
SC Business Dispatched	Same Day	1	2	3	4	5	>5
LCSC C Orders	3	5	5	3	1	4	3
% of Total Orders	12.5	20.83	20.83	12.5	4.17	16.67	12.5
% of Total Orders - Cumulative	12.5	33.33	54.17	66.67	70.83	87.5	100
BST C Orders	49	53	98	200	57	302	287
% of Total Orders	4.68	5.07	9.37	19.12	5.45	28.87	27.44
% of Total Orders - Cumulative	4.68	9.75	19.12	38.24	43.69	72.56	100
BST Business Dispatched							
LCSC Subtotals C Orders	59	69	63	64	42	42	197
% of Total Orders	11.01	12.87	11.75	11.94	7.84	7.84	36.75
% of Total Orders - Cumulative	11.01	23.88	35.63	47.57	55.41	63.25	100
BST Subtotals C Orders	1523	3635	4815	2552	2594	2413	5866
% of Total Orders	6.51	15.54	20.58	10.91	11.09	10.31	25.07
% of Total Orders - Cumulative	6.51	22.04	42.62	53.53	64.62	74.93	100
Total Residential LCSC C Orders	6631	4252	916	837	174	75	4165
% of Total Orders	49.85	31.97	6.89	6.29	1.31	0.56	3.11
% of Total Orders - Cumulative	49.85	81.82	88.71	95	96.31	96.87	100
Total Residential BST C Orders	1553472	838036	71028	104361	26982	7929	3493
% of Total Orders	58.92	31.78	2.69	3.96	1.02	0.3	1.3
% of Total Orders - Cumulative	58.92	90.7	93.39	97.35	98.37	98.68	100
Total Business LCSC C Orders	1752	1426	968	172	116	63	26
% of Total Orders	36.83	29.98	20.35	3.62	2.44	1.32	5.4
% of Total Orders - Cumulative	36.83	66.81	87.16	90.77	93.21	94.53	100

Total Business BST Orders	C	242372	83747	12648	7555	6928	3814	10
% of Total Orders		66	22.81	3.44	2.06	1.89	1.04	2.77
% of Total Orders - Cumulative		66	88.81	92.25	94.31	96.2	97.23	100

SC Residential	Same Day	1	2	3	4	5	>5
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Non-Dispatched

LCSC N Orders	24	23	18	212	219	153	410
% of Total Orders	2.27	2.17	1.7	20.02	20.68	14.45	38.72
% of Total Orders - Cumulative	2.27	4.44	6.14	26.16	46.84	61.28	100

BST N Orders	7536	2179	482	445	378	114	987
% of Total Orders	62.17	17.98	3.98	3.67	3.12	0.94	8.14
% of Total Orders - Cumulative	62.17	80.15	84.13	87.8	90.92	91.86	100

BST Residential Non-Dispatched

LCSC Subtotals N Orders	1908	4199	2309	2279	1853	1759	7199
% of Total Orders	8.87	19.52	10.74	10.6	8.62	8.18	33.47
% of Total Orders - Cumulative	8.87	28.4	39.13	49.73	58.35	66.53	100

BST Subtotals N Orders	94347	47331	11065	9321	6662	3213	15831
% of Total Orders	50.25	25.21	5.89	4.96	3.55	1.71	8.43
% of Total Orders - Cumulative	50.25	75.45	81.35	86.31	89.86	91.57	100

SC Residential	Same Day	1	2	3	4	5	>5
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Dispatched

LCSC N Orders	8	6	3	27	34	24	.
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% of Total Orders	3.07	2.3	1.15	10.34	13.03	9.2	60.9
% of Total Orders - Cumulative	3.07	5.36	6.51	16.86	29.89	39.08	100
BST N Orders	89	116	121	125	684	196	285
% of Total Orders	2.12	2.77	2.89	2.98	16.32	4.68	68.2
% of Total Orders - Cumulative	2.12	4.89	7.78	10.76	27.09	31.77	100
BST Residential Dispatched							
LCSC Subtotals N Orders	173	598	681	635	692	537	200
% of Total Orders	3.25	11.24	12.8	11.94	13.01	10.1	37.6
% of Total Orders - Cumulative	3.25	14.5	27.3	39.24	52.25	62.34	100
BST Subtotals N Orders	1450	10937	14039	14083	13001	9903	3589
% of Total Orders	1.46	11.01	14.14	14.18	13.09	9.97	36.1
% of Total Orders - Cumulative	1.46	12.47	26.61	40.79	53.88	63.86	100
SC Business Non-Dispatched							
	Same Day	1	2	3	4	5	>5
LCSC N Orders	9	26	6	3	7	2	6
% of Total Orders	15.25	44.07	10.17	5.08	11.86	3.39	10.1
% of Total Orders - Cumulative	15.25	59.32	69.49	74.58	86.44	89.83	100
BST N Orders	1272	119	37	58	20	20	12
% of Total Orders	77.23	7.23	2.25	3.52	1.21	1.21	7.3
% of Total Orders - Cumulative	77.23	84.46	86.7	90.22	91.44	92.65	100
BST Business Non-Dispatched							
LCSC Subtotals N Orders	273	241	108	121	64	68	13
% of Total Orders	27.11	23.93	10.72	12.02	6.36	6.75	13.1
% of Total Orders - Cumulative	27.11	51.04	61.77	73.78	80.14	86.89	100
BST Subtotals N Orders	17566	2292	1076	700	516	330	200

% of Total Orders	71.75	9.36	4.4	2.86	2.11	1.35	8
% of Total Orders - Cumulative	71.75	81.12	85.51	88.37	90.48	91.83	100
SC Business Dispatched	Same Day	1	2	3	4	5	>5
LCSC N Orders	38	43	15	18	12	4	100
% of Total Orders	26.76	30.28	10.56	12.68	8.45	2.82	8.4
% of Total Orders - Cumulative	26.76	57.04	67.61	80.28	88.73	91.55	100
BST N Orders	35	42	71	205	43	204	538
% of Total Orders	3.07	3.69	6.23	18	3.78	17.91	47.3
% of Total Orders - Cumulative	3.07	6.76	12.99	30.99	34.77	52.68	100
BST Business Dispatched							
LCSC Subtotals N Orders	649	842	365	267	236	140	619
% of Total Orders	20.82	27.01	11.71	8.57	7.57	4.49	19
% of Total Orders - Cumulative	20.82	47.83	59.54	68.11	75.68	80.17	
BST Subtotals N Orders	701	2683	3985	2420	2263	1932	961
% of Total Orders	2.97	11.37	16.89	10.26	9.59	8.19	40.7
% of Total Orders - Cumulative	2.97	14.34	31.23	41.49	51.08	59.27	100
Total Residential LCSC N Orders	2081	4797	2990	2914	2545	2296	920
% of Total Orders	7.76	17.88	11.15	10.86	9.49	8.56	34
% of Total Orders - Cumulative	7.76	25.64	36.79	47.65	57.14	65.7	100
Total Residential BST N Orders	95797	58268	25104	23404	19663	13116	5172
% of Total Orders	33.37	20.3	8.74	8.15	6.85	4.57	18.0
% of Total Orders - Cumulative	33.37	53.67	62.41	70.56	77.41	81.98	100
Total Business LCSC N Orders	922	1083	473	388	300	208	75
% of Total Orders	22.36	26.26	11.47	9.41	7.27	5.04	18.1
% of Total Orders - Cumulative	22.36	48.62	60.09	69.5	76.77	81.81	100
Total Business BST N	18267	4975	5061	3120	2779	2262	116

Orders							
% of Total Orders	38	10.35	10.53	6.49	5.78	4.71	24.15
% of Total Orders - Cumulative	38	48.34	58.87	65.36	71.14	75.85	100

	Same Day	1	2	3	4	5	>5
SC Residential							

Non-Dispatched

LCSC T Orders	1	7	0	0	0	1	0
% of Total Orders	11.11	77.78	0	0	0	11.11	0
% of Total Orders - Cumulative	11.11	88.89	88.89	88.89	88.89	100	100

BST T Orders	1029	1215	564	501	415	199	1190
% of Total Orders	20.13	23.76	11.03	9.8	8.12	3.89	23.27
% of Total Orders - Cumulative	20.13	43.89	54.92	64.72	72.83	76.73	100

BST Residential
Non-Dispatched

LCSC Subtotals T Orders	110	170	62	56	28	14	15
% of Total Orders	24.18	37.36	13.63	12.31	6.15	3.08	3.3
% of Total Orders - Cumulative	24.18	61.54	75.16	87.47	93.63	96.7	100

BST Subtotals T Orders	16595	22983	11453	9865	7880	3975	20514
% of Total Orders	17.79	24.64	12.28	10.58	8.45	4.26	22
% of Total Orders - Cumulative	17.79	42.44	54.72	65.29	73.74	78	100

	Same Day	1	2	3	4	5	>5
SC Residential							

Dispatched

LCSC T Orders	0	1	0	0	0	0	0
% of Total Orders	0	100	0	0	0	0	0
% of Total Orders - Cumulative	0	100	100	100	100	100	100

BST T Orders	32	43	67	50	381	89	1498
% of Total Orders	1.48	1.99	3.1	2.31	17.64	4.12	69.35

% of Total Orders - Cumulative	1.48	3.47	6.57	8.89	26.53	30.65	100
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BST
Residential
Dispatched

LCSC Subtotals T Orders	3	29	33	34	25	23	47
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% of Total Orders	1.55	14.95	17.01	17.53	12.89	11.86	24.23
% of Total Orders - Cumulative	1.55	16.49	33.51	51.03	63.92	75.77	100

BST Subtotals T Orders	549	3670	5770	5949	5755	4034	22138
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% of Total Orders	1.15	7.67	12.05	12.43	12.02	8.43	46.25
% of Total Orders - Cumulative	1.15	8.81	20.87	33.3	45.32	53.75	100

Same Day	1	2	3	4	5	>5
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SC
Business

Non-Dispatched

LCSC T Orders	0	0	1	0	0	0	0
% of Total Orders	0	0	100	0	0	0	0
% of Total Orders - Cumulative	0	0	100	100	100	100	100

BST T Orders	30	12	13	11	5	3	24
% of Total Orders	30.61	12.24	13.27	11.22	5.1	3.06	24.49
% of Total Orders - Cumulative	30.61	42.86	56.12	67.35	72.45	75.51	100

BST
Business
Non-Dispatched

LCSC Subtotals T Orders	1	2	4	0	1	0	2
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% of Total Orders	10	20	40	0	10	0	20
% of Total Orders - Cumulative	10	30	70	70	80	80	100

BST Subtotals T Orders	866	557	298	228	165	114	541
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% of Total Orders	31.25	20.1	10.75	8.23	5.95	4.11	19.6
% of Total Orders - Cumulative	31.25	51.35	62.11	70.34	76.29	80.4	100

Same Day	1	2	3	4	5	>5
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SC
Business

Dispatched

LCSC T Orders	0	0	0	0	0	0	1
% of Total Orders	0	0	0	0	0	0	100
% of Total Orders - Cumulative	0	0	0	0	0	0	100

BST T Orders	16	20	14	49	26	49	222
% of Total Orders	4.04	5.05	3.54	12.37	6.57	12.37	56.06
% of Total Orders - Cumulative	4.04	9.09	12.63	25	31.57	43.94	100

BST Business Dispatched

LCSC Subtotals T Orders	2	4	9	5	3	11	18
% of Total Orders	3.85	7.69	17.31	9.62	5.77	21.15	34.62
% of Total Orders - Cumulative	3.85	11.54	28.85	38.46	44.23	65.38	100

BST Subtotals T Orders	242	905	1242	895	799	624	4416
% of Total Orders	2.65	9.92	13.61	9.81	8.76	6.84	48.41
% of Total Orders - Cumulative	2.65	12.57	26.19	36	44.76	51.59	100

Total Residential LCSC T Orders	113	199	95	90	53	37	62
% of Total Orders	17.41	30.66	14.64	13.87	8.17	5.7	9.55
% of Total Orders - Cumulative	17.41	48.07	62.71	76.58	84.75	90.45	100

Total Residential BST T Orders	17144	26653	17223	15814	13635	8009	42652
% of Total Orders	12.15	18.89	12.2	11.21	9.66	5.67	30.22
% of Total Orders - Cumulative	12.15	31.03	43.24	54.44	64.1	69.78	100

Total Business LCSC T Orders	3	6	13	5	4	11	20
% of Total Orders	4.84	9.68	20.97	8.06	6.45	17.74	32.26
% of Total Orders - Cumulative	4.84	14.52	35.48	43.55	50	67.74	100

Total Business BST T Orders	1108	1462	1540	1123	964	738	4959
% of Total Orders	9.32	12.29	12.95	9.44	8.1	6.2	41.69
% of Total Orders - Cumulative	9.32	21.61	34.56	44	52.1	58.31	100

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYBellSouth Telecommunications, Inc
Reply Exhibit WNS-2
Page 1 of 16**ISSUE DATE TO COMPLETION DATE AVERAGE INTERVAL REPORT**

(Number of Hours)

Time Period: 10/1/97 - 10/31/97

ORDER TYPE	CLASS OF SERVICE	BST		CLEC	
		S.C.	AGGREGATE	S.C.	AGGREGATE
"C"	Residence Non Dispatch	1.6	1.7	1.7	2.2
	Residence Dispatch Out	6.1	6.0	1.0	5.4
	Business Non Dispatch	1.6	1.5	1.9	2.2
	Business Dispatch Out	6.7	6.0	4.0	6.8
"N"	Residence Non Dispatch	2.4	2.8	6.2	5.2
	Residence Dispatch Out	8.0	7.3	8.0	6.5
	Business Non Dispatch	2.2	2.7	3.7	3.6
	Business Dispatch Out	12.6	10.3	3.2	4.9
"T"	Residence Non Dispatch	4.8	4.9	2.3	2.7
	Residence Dispatch Out	9.4	8.7	2.0	5.8
	Business Non Dispatch	5.1	4.9	3.0	5.6
	Business Dispatch Out	12.9	11.2	13.0	9.7